

Christine Jump

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Jeremiah W. (Jay) Nixon, Governor • Mark N. Templeton, Director

## DEPARTMENT OF NATURAL RESOURCES

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July 7, 2010

CERTIFIED MAIL -7009 0080 0000 1925 5442  
RETURN RECEIPT REQUESTED

Mr. Joseph W. Haake  
Group Manager  
Environment Health and Safety  
The Boeing Company  
Department 107E, Building 111  
Mail Code S111-2491  
P.O. Box 516  
St. Louis, MO 63166-0516

RE: Approval of Final Corrective Measures Study Work Plan Tract 1 Dated April 2010  
The **Boeing Company**, Hazelwood, Missouri, EPA ID# **MOD000818963**

Dear Mr. Haake:

This letter is to notify you that the Missouri Department of Natural Resources' Hazardous Waste Program and the U.S. Environmental Protection Agency Region VII have completed review of the subject work plan. This work plan was submitted by Boeing in accordance with the Hazelwood facility's Missouri Hazardous Waste Management Facility Part I Permit dated March 5, 1997. The Hazardous Waste Program and the Environmental Protection Agency hereby approve the subject work plan with the following comments and conditions.

Throughout the work plan, there are references to stabilizing the groundwater plume. While plume stabilization may be an interim goal, the ultimate goal of remediation should be to decrease the size of the plume and the contaminant concentrations within the plume.

Page 1-4, Section 1.2.3.2: This section concerns Sub-area 2B and dermal contact risks. Please note that in Table 2-1 there are other constituents of concern that present a dermal contact risk in Sub-area 6B.

The work plan includes a draft Missouri Environmental Covenant in Appendix D. While we had not expected to receive a fully developed draft of this environmental covenant until submission of the Corrective Measures Study (CMS) Report, we did note that the "Compliance Reporting" element has been lined out and recommended for elimination from the environmental covenant.



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A notation is included as follows: "Propose to delete this requirement as unnecessary given the use limitations." We believe this item is a necessary part of this environmental covenant to the extent that it will be proposed as part of the preferred final remedy in the CMS Report. While our post-remedy selection regulatory oversight does include periodic review and inspection of remedy elements, we do not have the resources to routinely confirm that the proper documents remain in the property chain of title. We cannot visit the recorder's office and/or perform on-line verification of property recordings at the frequency that we would like. We have, on occasion, checked for such documents at other sites and discovered them to be absent after they were filed with the recorder. It has therefore been our practice to require annual verification by the owner/operator that environmental covenants remain in place. Ultimately, we would like any environmental covenant to include this provision. The draft environmental covenant should be included in your CMS Report as part of the preferred final remedy.

If you have any questions regarding this letter, please contact Christine Kump-Mitchell, P.E., of my staff, at the Missouri Department of Natural Resources, 7545 South Lindbergh, Suite 210, St. Louis, MO 63125-4839, or by phone at (314) 416-2960 or 1-800-361-4827, or by e-mail at christine.kump@dnr.mo.gov. Thank you.

Sincerely,

HAZARDOUS WASTE PROGRAM



Richard A. Nussbaum, P.E., R.G.  
Chief, Permits Section

RAN:bss

c: Ms. Joletta Golik, Environmental Manager, Lambert St. Louis International Airport  
Ms. Christine Jump, Missouri State Coordinator, U.S. EPA Region VII  
Ms. Amber Whisnant, Project Manager, U.S. EPA Region VII  
St. Louis Regional Office, Missouri Department of Natural Resources